

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 2419  
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**MOTION FOR LEAVE TO FILE REPLY**  
**IN SUPPORT OF PSC’S JOINT MOTION FOR ENTRY OF ESI PROTOCOL AND**  
**ASSENTED TO MOTION ENTRY OF DEPOSITION PROTOCOL**

The Plaintiffs’ Steering Committee (“PSC”) respectfully move, in accordance with Rule 7.1(b)(3) of the Local Rules of the United States District Court for the District of Massachusetts, for leave to file a Reply to the responses to the PSC’s Joint Motion for Entry of ESI Protocol (Dkt. No. 993) and the Assented to Motion for Entry of Revised Deposition Protocol (Dkt. No. 994).

In light of the arguments advanced in opposition to the PSC’s Motion for Entry of the Revised Deposition Protocol (Dkt. No 981 and 983), the PSC respectfully requests the Court grant them leave to file a brief written reply in order to address those arguments that were raised in those oppositions.

Dated: April 1, 2014

Respectfully submitted,

**/s/ J. Gerard Stranch, IV**

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**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: April 1, 2014

**/s/ J. Gerard Stranch, IV**  
J. Gerard Stranch, IV